

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
WACO DIVISION

SOLAS OLED LTD., an Irish corporation,

Plaintiff,

v.

LG DISPLAY CO., LTD., a Korean
corporation; LG ELECTRONICS, INC., a
Korean corporation; and SONY
CORPORATION, a Japanese corporation,

Defendants.

CASE NO. 6:19-CV-00236-ADA

JURY TRIAL DEMANDED

DECLARATION OF BLAKE R. DAVIS IN SUPPORT OF DEFENDANTS'
RESPONSIVE CLAIM CONSTRUCTION BRIEF

I, Blake R. Davis, hereby declares and state as follows:

I am over the age of eighteen and I am of sound mind. I am an attorney at Latham & Watkins, LLP, counsel of record for Defendants LG Display Co., Ltd., LG Electronics, Inc., and Sony Corporation in the above-captioned matter. I have personal knowledge of the facts set forth herein. If called to testify, I could and would testify competently thereto.

1. Attached hereto as Exhibit 28 is a true and correct copy of the April 3, 2020 Responsive Declaration of Douglas R. Holberg.

2. Attached hereto as Exhibit 29 is a true and correct copy of excerpts from the file history of U.S. Patent 7,907,137, March 29, 2006 Claims.

3. Attached hereto as Exhibit 30 is a true and correct copy of excerpts from the file history of U.S. Patent 7,907,137, May 24, 2010 Office Action.

4. Attached hereto as Exhibit 31 is a true and correct copy of excerpts from the November 25, 2019 Petition for *Inter Partes* Review of U.S. Patent No. 7,432,891.

5. Attached hereto as Exhibit 32 is a true and correct copy of excerpts from the Claim Chart for U.S. Patent No. 7,573,068, which was attached as First Amended Exhibit B to Solas' March 20, 2020 First Amended Disclosure of Preliminary Infringement Contentions.

6. Attached hereto as Exhibit 33 is a true and correct copy of excerpts from Japanese Patent JP 2006-100727A, and machine translations of the same from Japanese to English.

7. Attached hereto as Exhibit 34 is a true and correct copy of U.S. Patent No. 7,317,429.

8. Attached hereto as Exhibit 35 is a true and correct copy of <https://www.dictionary.com/browse/together?s=t> (accessed April 3, 2020) (defining "together").

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 3, 2020 in Berkeley, California.

/s/ Blake R. Davis

Blake R. Davis